

Stentor Resource  
Centre Inc.

B.C. Schurr  
Rates Planning & Regulatory Support

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**STENTOR**   
The Power of Telecommunications

Office of the Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Attn: William F. Caton  
Acting Secretary

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JUN 7 1994

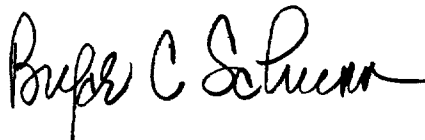
Dear Sir:

FCC MAIL ROOM

Subject: FCC Docket on Administration of the North American  
Numbering Plan (CC Docket No. 92-237) Phase 1 & 2

On behalf of AGT Limited, BC TEL, Bell Canada, The Island Telephone Company Limited (Island Tel), Manitoba Telephone System (MTS), Maritime Tel & Tel Limited (MT&T), the New Brunswick Telephone Company Limited (NBTEL), Newfoundland Telephone Company Limited (Newfoundland Tel) and SaskTel (collectively referred to as the "Companies"), Stentor Resource Centre Inc. submits the attached comments on CC Docket No. 92-237 in accordance with the procedures set forth in Sections 1.415 and 1.419 of the Commission's rules. These comments are submitted without prejudice to the further participation of the Companies in this proceeding.

Yours truly,



Rates Planning & Regulatory Support

Attachment

c.c: Stentor Regulatory Planning Committee

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**Stentor Resource  
Centre Inc.**

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**FEDERAL COMMUNICATIONS COMMISSION  
NOTICE OF PROPOSED RULE MAKING  
REGARDING  
ADMINISTRATION OF THE NORTH AMERICAN  
NUMBERING PLAN**

CC DOCKET NO. 92-237

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**SUBMISSION BY  
STENTOR RESOURCE CENTRE INC.**

**June 7, 1994**

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of:

Administration of the North  
American Numbering Plan

)  
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CC Docket No. 92-237  
Phases One and Two

**COMMENTS  
OF  
STENTOR RESOURCE CENTRE INC.**

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5 Stentor Resource Centre Inc. (Stentor), on behalf of its Owner Companies (collectively referred to as the Stentor Companies), submits these comments in response to the Notice of Proposed Rulemaking released by the Federal Communications Commission (FCC) on April 4, 1994.

10 An Alliance of Canada's major telephone companies, the Stentor Companies provide customers uniform, leading-edge products and services and service excellence across Canada and internationally. The nine companies in the Stentor alliance are: AGT Limited, BC TEL, Bell Canada, The Island Telephone Company Limited, Manitoba Telephone System, Maritime Tel & Tel Limited, The New Brunswick Telephone Company Limited, Newfoundland Telephone Company Limited, and SaskTel.

15 **1.0 INTERNATIONAL IMPLICATIONS**

The Stentor Companies are participants in the North American Numbering Plan (NANP). Stentor submits that the benefits of participating in this plan are significant for both Canadian consumers and industry. Stentor continues to support the operation of the Canadian telecommunications industry as an integral part of the NANP. Stentor  
20 recognizes that the shared and cooperative nature of the NANP requires involvement from all sectors including the telecommunications industry, users, regulators and governments. Stentor recognizes the FCC's plenary authority over U.S. numbering resources and notes that Industry Canada, in association with the Canadian Radio-television and Telecommunications Commission (CRTC), exercises similar plenary

authority over Canadian numbering resources. Government and regulatory oversight of the NANP and related administrative activities must reflect the requirements of all nations contained within World Zone 1 (WZ1). Stentor submits that the various governments and regulators should coordinate their policy, regulatory, and oversight activities to ensure consistency in number planning to the maximum extent practicable in WZ1, within a framework which permits unique government policies and regulatory decisions to be implemented to meet national objectives and requirements. Such consistency is necessary to promote convenient and uniform dialling throughout WZ1. Stentor submits there should be a coordinated set of activities concerning policy development, number planning, and number resource management on a WZ1-wide basis involving both the telecommunications industry, users, regulators, and governments.

Stentor, on behalf of the Stentor Companies, participates in the WZ1 industry fora associated with numbering resources, including the Future of Numbering Forum (FNF) and the Industry Numbering Committee (INC). Stentor submits that the work being performed by the FNF and INC is both constructive and useful in addressing issues regarding the management of numbering resources. Stentor supports the continuation of these fora to establish the appropriate mechanisms for: the administration of the NANP, the provision of industry oversight of the NANP and its administrator, and for the development of industry consensus policy recommendations to governments and regulators on a WZ1-wide basis. Stentor intends to participate in the establishment of such WZ1 mechanisms and in the related Canadian activities.

Regarding the selection of a NANP Administrator (NANPA), Stentor submits that this process must permit participation by industry entities from all countries within WZ1. Furthermore, Stentor submits that the opportunity to perform the function of NANPA should be open to organizations from any WZ1 nation.

Concerning the organization of the NANPA, Stentor submits that the NANPA organization must reflect both its overall WZ1-wide numbering mandate and the requirements of all nations within WZ1. The NANPA organization must, therefore, incorporate a structure with

capabilities to manage and administer number resources on a WZ1-wide basis while reflecting the unique national requirements and regulatory regimes of the WZ1 nations.

With respect to funding, Stentor submits that the NANP Administrator should be funded by all telecommunications industry entities which benefit from the use of numbering resources in WZ1. The funding methodology and collection method must be reasonably simple, efficient, and capture contribution from all entities using a graduated formula which is sensitive to the relative revenues of the entities.

## **2.0 NEW ADMINISTRATOR OF THE NANP**

Stentor submits that an impartial, non-governmental entity should manage and administer the NANP. Stentor conditionally supports the proposal for the NANPA to be established under the sponsorship of ATIS (Alliance for Telecommunications Industry Solutions, formerly the Exchange Carrier Standards Association) along with associated organizational components for resource management, oversight, policy development, and dispute resolution, provided that participation and membership at all levels of ATIS is open to telecommunications industry entities throughout WZ1.

Government oversight of the WZ1 NANP and its administrator must recognize the value of a single numbering plan and administration for the WZ1 area. Such oversight must be flexible to satisfy the unique objectives and circumstances of each nation participating in the NANP. A mechanism must be established to enable all WZ1 governments and regulators to exercise their respective authority on those resources of the NANP within their jurisdiction.

Stentor submits that the transition period for transferring responsibility for the NANP from Bellcore to a new entity should begin as soon as the new administrator is identified, should extend to a date at least six months after the change to Interchangeable NPAs (INPAs) in January 1995, and should be completed by December 31, 1995.

### **3.0 PARAMETERS FOR THE NEW ADMINISTRATOR**

Stentor submits that the mission of the NANPA should be to administer the NANP resources using established industry guidelines on a cost-effective, timely, and impartial basis, under WZ1 governmental policies, regulatory decisions, and national requirements.

- 5 With respect to functions, Stentor submits that the functions of the NANPA should be to:
- i) assign and administer number resources in accordance with approved industry guidelines.
  - ii) monitor compliance with the terms and conditions of number assignment guidelines.
  - 10 iii) resolve non-compliance, and refer unresolvable issues and disputes to an industry oversight mechanism and/or the appropriate WZ1 regulator(s).
  - iv) interact with industry to develop industry approved guidelines for administering number resources.
  - v) monitor the capability of the NANP to meet current and future industry
  - 15 requirements, and make associated recommendations for modifying the NANP.
  - vi) facilitate long-term planning for the evolution of the NANP in order to meet industry requirements.

Concerning management, Stentor submits that the management functions within NANPA should be to:

- 20
- i) establish and manage number administration databases.
  - ii) manage the NANPA in an efficient and cost-effective manner.
  - iii) identify the need for new procedures, guidelines, planning practices, methodologies, and like matters.

Regarding structure, Stentor submits that the NANPA:

- i) should be established as a separate non-governmental organization and associated closely with its complementary industry oversight and management functions.
- 5 ii) should permit national specialization and flexibility within the overall structure in order to meet the requirements of all nations participating in the WZ1 NANP.

With respect to personnel issues, Stentor submits that staffing policies of the NANPA should include non-discriminatory employment opportunities for individuals from all WZ1 nations.

- 10 Regarding NANPA capabilities, Stentor submits that the key capabilities required include knowledge of the needs and requirements of all industry segments, WZ1 national government policies and regulatory requirements, and number resource planning. In addition, the NANPA must be provided the resources to implement and maintain the necessary tools, data bases and support systems.

#### 15 **4.0 POLICY MAKING AND DISPUTE RESOLUTION**

- Stentor submits that an industry-based WZ1 mechanism for numbering policy development and dispute resolution is appropriate for many of the contentious issues involving numbering. The consensus process is used widely by most industry fora and has proven to be a valuable means to reach resolution. Stentor also submits that mediation and
- 20 binding arbitration may be appropriate industry methods for resolving disputes in certain situations. Stentor therefore supports a flexible approach for dispute resolution which would permit the use of consensus, mediation, or binding arbitration as industry dispute resolution mechanisms. The oversight committee and the parties involved in the dispute should determine the appropriate mechanism to be used to resolve any specific dispute.
  - 25 Stentor supports such an escalation capability within the industry numbering organization context, with the ultimate ability to escalate to the appropriate regulator(s), except where parties to a dispute have formally agreed to an industry-based binding arbitration process.

A properly designed industry process can provide an efficient escalation mechanism to move an issue through the working forum level, an oversight/policy level, and where necessary to a national resolution at the regulatory level.

5 Stentor submits that a numbering policy/oversight structure within a modified ATIS would be a suitable industry-based mechanism to address WZ1 policy making and dispute resolution issues. There is also value in associating the various numbering functions of oversight, policy development, resource management, and NANPA within that same structure.

10 Stentor submits that the industry oversight/policy development mechanism should be an open forum where WZ1 governments and regulatory agencies could attend and participate in industry oversight/policy meetings on an *ex officio* basis. The value of such participation is in the resulting familiarity and continuity on issues where a regulatory authority may ultimately be called upon to resolve an issue or rule upon a dispute.

15 Any government or regulatory agency may review and rule on the applicability of WZ1 industry-developed policies in its specific country. Furthermore, any country, if it deems it necessary, may establish its own national number policy advisory board to review WZ1 industry-consensus policies and address numbering matters which may be unique to a WZ1 nation because of regulatory decisions and government policy. This is the role presently performed in Canada by the Canadian Steering Committee on Numbering  
20 (CSCN).

## **5.0 CENTRAL OFFICE (CO) NXX CODE ASSIGNMENT**

With respect to the expansion of NANPA functions to include CO NXX codes, Stentor does not support the centralization of the assignment of CO codes by the NANPA. The reason for this position is that centralization of CO Code assignment would not provide a  
25 significant benefit to the industry, as it would complicate and compound the planning, administration, and coordination of these resources, and increase the costs of the operating telephone companies.



Stentor disagrees with the apparent industry presumption that simple assignment to entities is the critical task involved in geographic NPA NXX administration. The associated and integral NPA planning, administration, and coordination with other users of this resource is a significant task, the cost of which is borne by the operating telephone companies. To fragment this function through centralization of the assignment role does not provide a benefit; rather, it would complicate and compound the associated activities.

Stentor is currently reviewing the ICCF CO Code Guidelines (July 1993) and is preparing a proposal for consideration by the CSCN with respect to Canadian industry requirements. Stentor suggests that a centralized registry of assigned CO codes in NANPA would benefit the industry, and that it is not necessary to also transfer the function of CO code administration to a third party administrator.

Furthermore, given the transfer of NANPA from Bellcore to a new organization, and the re-engineering of the current industry numbering organization, this would not be an appropriate time to consider the transfer of the additional function of CO code assignment to the new organization.

## **6.0 FUNDING FOR NANP ADMINISTRATION**

Any new funding mechanism must ensure fair and equitable cost sharing by all entities involved in the telecommunications industry in WZ1 (e.g., local exchange carriers, cellular service providers, interexchange carriers, alternate service providers, enhanced service providers, etc.). The fee methodology and collection process must be reasonably simple, efficient, and capture contribution from all entities and service providers.

Stentor does not believe that the cost of administration of the NANP should fall solely on the local telephone service providers (e.g., local exchange carriers, cellular service providers). A formula that uses telephone numbers as a prime factor would result in an inequitable cost share burden for local telephone companies as other entities, such as IX carriers, who do not have significant dedicated number resources but benefit greatly from

the use of the numbering resources by other parties, would not pay a share of the costs. The formula must ensure that all relevant entities help to pay the costs of the NANPA.

5 Stentor supports a funding formula which incorporates a weighting based on annual operating revenues of the telecommunications industry entities which benefit from the utilization of numbering resources. Stentor does not believe that a voluntary funding scheme will provide a consistent or adequate source of funding.

10 Stentor does not support the adoption of the NANP Administration role by the FCC, nor does it agree that fees imposed by governmental regulatory authorities should be used to fund an industry-based NANPA. Furthermore, the inclusion of other FCC administration costs in WZ1 fees is inappropriate. If cost recovery for regulatory or governmental oversight is necessary, this should be done outside of the industry appointed NANPA cost recovery mechanism. The costs of regulation in any country should be borne exclusively by that nation and/or entities within that nation.

15 Cost recovery for the industry-based WZ1 NANPA and associated oversight and policy components could be recovered through the funding processes that the WZ1 industry may put in place.

Stentor respectfully submits these comments to the FCC.